## **REQUEST FOR PRODUCTION NO. 55:**

All documents and tangible things in your possession, custody, or control sufficient to establish the amounts of Putnam-related compensation of any type (including cash and noncash forms of compensation) earned or received by each of the members of the Investment Management Teams and the Boards of Trustees for each of the Funds at any and all times from January 1, 2002 to the present.

### **REQUEST FOR PRODUCTION NO. 56:**

All documents and tangible things in your possession, custody, or control that reflect, concern, refer, or relate to any decision or agreement made by PIM and/or PRM effective as of January 1, 2004 to cease directing brokerage to broker-dealers in connection with the sale of fund shares.

#### **REQUEST FOR PRODUCTION NO. 57:**

All documents and tangible things in your possession, custody, or control that constitute the Fundamental Agreements and Declarations of Trust for each of The Funds, and/or any amendments or modifications thereto.

#### **REQUEST FOR PRODUCTION NO. 58:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, or concern any investment policies, investment objectives, investment classifications, and/or investment restrictions applicable to each of The Funds at any and all times during the Damages Period.

# **REQUEST FOR PRODUCTION NO. 59:**

All documents and tangible things in your possession, custody, or control that constitute, reflect or concern any policies relating to the practice of simultaneously servicing multiple accounts that have been applicable to any member of any Investment Management Team for any of the Putnam Mutual Funds.

# **REQUEST FOR PRODUCTION NO. 60:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, or concern any policies, practices, or procedures relating to trade allocations and/or to "cross-trading" among or between Putnam-advised accounts.

### **REQUEST FOR PRODUCTION NO. 61:**

All documents and tangible things in your possession, custody, or control that constitute any written code of ethics applicable to any employee of PIM or PRM.

## **REQUEST FOR PRODUCTION NO. 62:**

All documents and tangible things in your possession, custody, or control that constitute any record retention policies adopted or followed by PIM and/or PRM.

#### **REQUEST FOR PRODUCTION NO. 63:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to the issues of if, whether, or to what extent PIM and/or PRM have insurance coverage potentially applicable to the costs of defending the above-captioned action, and/or to indemnification for any damages awarded or assessed in the above-captioned action.

# **REQUEST FOR PRODUCTION NO. 64:**

All documents and tangible things in your possession, custody, or control that constitute non-publicly issued financial reports prepared by, or on behalf of, any Putnam entity that concern or relate to the provision of management and/or investment advisory services to any of The Funds. Such financial reports might be expected to include, for example,

calculations, assessments, itemizations, reviews, cost benefit analyses, or other summarizations of PIM's costs and expenses incurred, income and revenues received, and/or profits realized.

# **REQUEST FOR PRODUCTION NO. 65:**

All documents and tangible things in your possession, custody, or control relevant to identifying, and establishing the amounts of, each of the various types of monies, fees, and/or reimbursable expenses other than Management Fees or 12b-1 Fees that PIM, PRM, or other affiliated Putnam entities have received from any of The Funds at any and all times during the Damages Period.

#### **REQUEST FOR PRODUCTION NO. 66:**

All documents and tangible things in your possession, custody, or control relevant to establishing the profits and profit margins that PIM, PRM, or other affiliated Putnam entities have realized in connection with each of the various types of monies, fees, and/or reimbursable expenses other than Management Fees or 12b-1 Fees that they have received from any of The Funds at any and all times during the Damages Period.

### **REQUEST FOR PRODUCTION NO. 67:**

All documents and tangible things in your possession, custody, or control relevant to establishing the costs, expenses, and expense ratios that PIM, PRM, or other affiliated Putnam entities have incurred in connection with each of the services and/or resources that they have provided in exchange for the various types of monies, fees, and/or reimbursable expenses other than Management Fees or 12b-1 Fees that they have received from any of The Funds at any and all times during the Damages Period.

# **REQUEST FOR PRODUCTION NO. 68:**

All documents and tangible things in your possession, custody, or control relevant to establishing what other persons or entities were paid monies, and in what amounts, by PIM and/or PRM in connection with their provision of services to The Funds at any and all times during the Damages Period.

# **REQUEST FOR PRODUCTION NO. 69:**

All documents and tangible things in your possession, custody, or control relevant to identifying, and establishing the amounts of, each of the various types of costs and expenses that each of The Funds incurred at any and all times during the Damages Period other than from their payments of Management Fees or 12b-1 Fees including, but not limited to, investor servicing fee expenses; custodian fee expenses; trustee compensation costs and expenses; administrative services expenses; and/or any other types of costs or expenses.

## **REQUEST FOR PRODUCTION NO. 70:**

All documents and tangible things in your possession, custody, or control relevant to identifying each of the various types of services and/or resources that were provided to each of The Funds at any and all times during the Damages Period in exchange for the various types of monies, fees, and/or reimbursable expenses other than Management Fees or 12b-1 Fees that were paid by any of The Funds.

# **REQUEST FOR PRODUCTION NO. 71:**

All documents and tangible things in your possession, custody, or control relevant to identifying and establishing the persons or entities who received payments from any of The Funds, and in what amounts, in connection with the various types of costs and expenses that

The Funds incurred at any and all times during the Damages Period other than from their payments of Management Fees or 12b-1 Fees.

## **REQUEST FOR PRODUCTION NO. 72:**

All documents and tangible things in your possession, custody, or control that constitute the minutes or notes of each meeting of any of the Boards of Trustees, or of their Boards of Trustees Committees, for any of The Funds held at any time from January 1, 2002 to the present.

# **REQUEST FOR PRODUCTION NO. 73:**

All documents and tangible things in your possession, custody, or control that constitute materials shown or provided to, and/or considered by, any of the Boards of Trustees, or their Boards of Trustees Committees, for any of The Funds in connection with any of their meetings held at any time from January 1, 2002 to the present.

#### **REQUEST FOR PRODUCTION NO. 74:**

All documents and tangible things in your possession, custody, or control that constitute any Management Contract and/or Distribution Plans entered into or adopted by any of The Funds, including any earlier versions, drafts, or proposals of or for any such Management Contracts or Distribution Plans.

### **REQUEST FOR PRODUCTION NO. 75:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate to any negotiations, bargaining, or communications relating to any actual or proposed Management Fees, Management Contracts, 12b-1 Fees, or Distribution Plans among or between PIM, PRM, or other affiliated Putnam entities, and any of the Boards of Trustees, or their Boards of Trustees Committees, for any of The Funds.

## **REQUEST FOR PRODUCTION NO. 76:**

All documents and tangible things in your possession, custody, or control that reflect, concern, refer, or relate to any consideration given by any of the Boards of Trustees, or their Boards of Trustees Committees, to the issue of whether or not to approve any actual or proposed Management Contract or Distribution Plan for any of The Funds.

## **REQUEST FOR PRODUCTION NO. 77:**

All documents and tangible things in your possession, custody, or control that constitute or reflect any information or materials provided to, and/or reviewed by, any of the Boards of Trustees, or their Boards of Trustees Committees, in connection with their consideration of whether or not to approve any actual or proposed Management Contract or Distribution Plan for any of The Funds. Such documents and tangible things should include, but not be limited to, those that constitute or reflect information or materials furnished pursuant to § 15(c) of the Investment Company Act of 1940.

#### **REQUEST FOR PRODUCTION NO. 78:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate to any criteria or policies used by any of the Boards of Trustees, or their Boards of Trustees Committees, in connection with their consideration of whether or not to approve any actual or proposed Management Contract or Distribution Plan for any of The Funds.

### **REQUEST FOR PRODUCTION NO. 79:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate to any suggestion, opinion, conclusion, or proposal about potentially withholding approval of any Management Contract or Distribution Plan for

any of the Putnam Mutual Funds by any of the Boards of Trustees, or by their Boards of Trustees Committees.

# **REQUEST FOR PRODUCTION NO. 80:**

All documents and tangible things in your possession, custody, or control that reflect, concern, refer, or relate to any consideration given by any of the Boards of Trustees, or their Boards of Trustees Committees, to terminating any Management Contract and/or Distribution Plan existing between any of the Putnam Mutual Funds and PIM or PRM.

# **REQUEST FOR PRODUCTION NO. 81:**

All documents and tangible things in your possession, custody, or control that reflect, concern, refer, or relate to any consideration given by any of the Boards of Trustees, or their Boards of Trustees Committees, to permitting, directing or obligating any of the Putnam Mutual Funds to pay Management Fees and/or 12b-1 Fees to any entities other than PIM or PRM.

### **REQUEST FOR PRODUCTION NO. 82:**

All documents and tangible things in your possession, custody, or control that reflect, concern, refer, or relate to any consideration given by any of the Boards of Trustees, or their Boards of Trustees Committees, to the requirements or standards imposed by Section 36(b) of the Investment Company Act of 1940 or Rule 12b-1 promulgated thereunder, and/or to the issues of whether PIM, PRM, or other affiliated Putnam entities have acted in compliance therewith in relation to any Management Contract or Distribution Plan with any of the Putnam Mutual Funds.

# **REQUEST FOR PRODUCTION NO. 83:**

All documents and tangible things in your possession, custody, or control that constitute or reflect any information or materials concerning Management Fees or 12b-1 Fee charged by entities other than PIM or PRM that have been shown or provided to, and/or considered by, any of the Boards of Trustees, or their Boards of Trustees Committees, for any of the Putnam Mutual Funds.

# **REQUEST FOR PRODUCTION NO. 84:**

All documents and tangible things in your possession, custody, or control that constitute or reflect any information or materials concerning PAC that have been shown or provided to, and/or considered by, any of the Board of Trustees, or their Board of Trustees Committees, for any of the Putnam Mutual Funds.

## **REQUEST FOR PRODUCTION NO. 85:**

All documents and tangible things in your possession, custody, or control that constitute or reflect any information or materials concerning the status, activities, investment performance or returns, or expense ratios of any of The Funds that have been shown or provided to, and/or considered by, any of the Boards of Trustees, or their Boards of Trustees Committees.

#### **REQUEST FOR PRODUCTION NO. 86:**

All documents and tangible things in your possession, custody, or control that reflect, concern, refer, or relate to any consideration given by any of the Boards of Trustees, or their Boards of Trustees Committees, in deciding whether or not to approve any actual or proposed Management Contract for any of The Funds to the factors for assessing the reasonableness of Management Fees established in Gartenberg v. Merrill Lynch Asset Management, Inc., 694

F.2d 923 (2d Cir. 1982) and its progeny. These factors include the following: (i) sharing of economics of scale benefit; (ii) comparisons to other relevant fee structures; (iii) the nature and quality of services provided; (iv) the profitability of The Funds to PIM and its affiliates; (v) the receipt of other Fall-Out Benefits or indirect profits; and (vi) the independence and conscientiousness of the Trustees.

## **REQUEST FOR PRODUCTION NO. 87:**

All documents and tangible things in your possession, custody, or control that reflect, concern, refer, or relate to any consideration given by any of the Boards of Trustees, or their Boards of Trustees Committees, for any of the Putnam Mutual Funds to articles written by critics of the alleged disparity between retail and institutional fee schedules, to articles by the ICI or others defending such fee differences, and/or to decisions of the courts providing guidance with respect to such issues.

## **REQUEST FOR PRODUCTION NO. 88:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to the issues of if, whether, how, or to what extent Economies of Scale Benefits and/or Fall-Out Benefits exist in the mutual fund industry relative to the provision of services in connection with Management Contracts and/or Distribution Plans.

### **REQUEST FOR PRODUCTION NO. 89:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to the issues of if, whether, how, or to what extent Economies of Scale Benefits and/or Fall-Out Benefits have been, are, could be, or should be shared as between providers of services in connection with Management Contracts and/or Distribution Plans on the one hand. and mutual funds or their shareholders on the other hand.

## **REQUEST FOR PRODUCTION NO. 90:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to the issues of if, whether, how, or to what extent PIM, PRM, and/or other affiliated Putnam entities realize Economies of Scale Benefits and/or Fall-Out Benefits in connection with their provision of any services or resources to any of the Putnam Mutual Funds.

## **REQUEST FOR PRODUCTION NO. 91:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to the issues of if, whether, how, or to what extent PIM, PRM, and/or other affiliated Putnam entities share with any of the Putnam Mutual Funds any Economies of Scale Benefits and/or Fall-Out Benefits they realize in connection with their provision of any services or resources to any of the Putnam Mutual Funds.

#### **REQUEST FOR PRODUCTION NO. 92:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, or concern any quantification of Economics of Scale Benefits and/or Fall-Out Benefits that PIM, PRM, and/or other affiliated Putnam entities realize in connection with their provision of any services or resources to any of the Putnam Mutual Funds.

#### **REQUEST FOR PRODUCTION NO. 93:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to the issues of whether PIM, PRM, or other affiliated Putnam entities have failed to share any Economies of Scale Benefits and/or Fall-Out Benefits with any of the Putnam Mutual Funds to a degree that has been inequitable, unfair, harmful, detrimental,

disadvantageous, or contrary to the interests or welfare of any of the Putnam Mutual Funds or their shareholders.

#### **REQUEST FOR PRODUCTION NO. 94:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate to any model schedules for Management Fees developed by, or on behalf of, PIM, PRM, and/or any of the Boards of Trustees, or their Boards of Trustees Committees, for any of the Putnam Mutual Funds, including any earlier versions, drafts, or proposals of or for such model fee schedules.

### **REQUEST FOR PRODUCTION NO. 95:**

All documents and tangible things in your possession, custody, or control that reflect, concern, or relate to any comparisons or contrasts drawn between the concepts of investment performance on the one hand, and investment process on the other hand, including investment process as it relates to research and/or decision-making.

#### **REQUEST FOR PRODUCTION NO. 96:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate to any explanations, characterizations, or descriptions of the investment process that has been or may be followed by PIM in providing services to any of the Putnam Mutual Funds, including the investment process as it relates to research and/or decision-making.

# **REQUEST FOR PRODUCTION NO. 97:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate to any indemnifications provided by PIM, PRM, or other affiliated Putnam entities to any of the Putnam Mutual Funds.

# **REQUEST FOR PRODUCTION NO. 98:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate to any policies, practices, or procedures that have been or may be followed by PIM, PRM, or other affiliated Putnam entities with regard to making disclosures to shareholders and/or to the public regarding any Management Fees and/or 12b-1 Fees charged to any Putnam Mutual Funds.

#### **REQUEST FOR PRODUCTION NO. 99:**

All documents and tangible things in your possession, custody, or control that constitute or reflect any of the investment programs that PIM has proposed or furnished to each of The Funds.

#### **REOUEST FOR PRODUCTION NO. 100:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to the development or formulation of each of the investment programs that PIM has proposed or furnished to each of The Funds.

## **REQUEST FOR PRODUCTION NO. 101:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate to each of the fee schedules for Management Fees and/or for 12b-1 Fees that PIM, PRM, or other affiliated Putnam entities have proposed or furnished to each of The Funds.

# **REQUEST FOR PRODUCTION NO. 102:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to the development or formulation of each of the fee schedules for Management Fees and/or for 12b-1 Fees that PIM, PRM, or other affiliated Putnam entities have proposed or furnished to each of The Funds.

# **REQUEST FOR PRODUCTION NO. 103:**

All documents and tangible things in your possession, custody, or control relevant to identifying, and/or establishing the amounts of, any Management Fees or 12b-1 Fees that PIM or PRM have received from any entity other than any of the Putnam Mutual Funds.

#### **REQUEST FOR PRODUCTION NO. 104:**

All documents and tangible things in your possession, custody, or control relevant to establishing on an annualized basis relative to each of The Funds for each of the years of their existence: (i) their respective portfolio holdings; (ii) the amounts of their assets under management; (iii) the amounts of their Management Fees and 12b-1 Fees paid; (iv) their applicable fee schedules; (v) the costs, expenses, and expense ratios incurred by PIM, PRM, or other affiliated Putnam entities; and (vi) the profits and profit margins realized by PIM, PRM, or other affiliated Putnam entities.

### **REQUEST FOR PRODUCTION NO. 105:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate to constitute any charters that have been or are applicable to any Boards of Trustees, or their Boards of Trustees Committees, for any of The Funds.

#### **REQUEST FOR PRODUCTION NO. 106:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate to any policies, practices, or procedures applicable to, and or adopted or followed by, PIM with respect to seeking and obtaining the most favorable prices and execution of trades on behalf of any of the Putnam Mutual Funds.

## **REQUEST FOR PRODUCTION NO. 107:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate to the drafting, revising, and/or inclusion of: (i) the new passage entitled "Management fee considerations" that recently began to appear on Putnam's web site; and/or (ii) the new standard passages entitled "Trustee approval of management contracts" that recently began to appear in, inter alia, the semiannual reports published on behalf of some or all of the Putnam Mutual Funds.

#### **REQUEST FOR PRODUCTION NO. 108:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to the issues of if, how, whether, or to what extent any conflicts of interests do or may exist between PIM, PRM, or other affiliated Putnam entities on the one hand, and any of the Putnam Mutual Funds and/or their shareholders on the other hand.

## **REQUEST FOR PRODUCTION NO. 109:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to the issues of if, how, whether, or to what extent the 12b-1 Fees charged by PRM or other affiliated Putnam entities have resulted in lower average expense ratios and/or lower flow volatility for any of the Putnam Mutual Funds.

#### **REQUEST FOR PRODUCTION NO. 110:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to the issues of if, how, whether, or to what extent the Management Fees and/or the 12b-1 Fees charged by PIM, PRM, or other affiliated Putnam entities have been or should be made transparent to actual or potential shareholders in any of the Putnam Mutual Funds.

## **REQUEST FOR PRODUCTION NO. 111:**

All documents and tangible things in your possession, custody, or control that reflect, concern, or relate to any comparisons or contrasts drawn between how the profits and/or profit margins that PIM, PRM, or other affiliated Putnam entities have realized on Management Fees and/or 12b-1 Fees charged to any of the Putnam Mutual Funds have varied across fee schedule breakpoints.

## **REQUEST FOR PRODUCTION NO. 112:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to any investigation by any governmental, administrative, or self-regulatory body regarding the propriety or amount of any fees charged to any of the Putnam Mutual Funds including, but not limited to, all documents produced in such investigations, all transcripts of testimony, and all communications with such governmental, administrative, or self-regulatory bodies concerning such investigations.

## **REQUEST FOR PRODUCTION NO. 113:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to any litigation, arbitration, or mediation proceedings involving PIM and/or PRM as parties that contained any allegation concerning excessive fees charged to any of the Putnam Mutual Funds including, but not limited to, complaints, orders, judgments and settlement agreements.

# **REQUEST FOR PRODUCTION NO. 114:**

All documents and tangible things in your possession, custody, or control that constitute organizational charts or any other documents describing the corporate structure of the Putnam family of entities, and/or the corporate relationships between PIM, PRM, PAC, Putnam LLC, and any of their other affiliates, parents, subsidiaries, and related entities.

### **REQUEST FOR PRODUCTION NO. 115:**

All documents and tangible things in your possession, custody, or control that constitute organizational charts, telephone books, directories, and other documents describing the names, positions, and/or responsibilities of the individual employees of PIM and PRM at any and all times from January 1, 2002 to the present.

#### **REQUEST FOR PRODUCTION NO. 116:**

All documents and tangible things in your possession, custody, or control relevant to establishing the appropriate Lipper peer group for each of The Funds.

# **REQUEST FOR PRODUCTION NO. 117:**

All documents and tangible things in your possession, custody, or control used for, or concerning, the training of any employees of Putnam entities including, but not limited to, any employee handbooks, manuals, procedure memoranda, and compliance guides.

### **REQUEST FOR PRODUCTION NO. 118:**

All documents and tangible things in your possession, custody, or control that constitute resumes, curriculum vitae or other documents containing the professional and working history for anyone who served as an officer, Trustee, or member of any of the Investment Management Teams for any of The Funds at any and all times during the Damages Period.

## **REQUEST FOR PRODUCTION NO. 119:**

All documents and tangible things in your possession, custody, or control that constitute organizational or charter documents for PIM and/or PRM including, but not limited to, articles or certificates of incorporation, partnership agreements, by-laws, and related filings with the relevant secretary of state.

# **REQUEST FOR PRODUCTION NO. 120:**

All documents and tangible things in your possession, custody, or control that constitute prospectuses for any of The Funds, including all supplements or amendments thereto, or that constitute computer databases serving as an underlying source of any financial information appearing in such prospectuses.

#### **REQUEST FOR PRODUCTION NO. 121:**

All documents and tangible things in your possession, custody, or control that constitute proxy statements for any of The Funds, including all supplements or amendments thereto, or that constitute computer databases serving as an underlying source of any financial information appearing in such prospectuses.

### **REQUEST FOR PRODUCTION NO. 122:**

All documents and tangible things in your possession, custody, or control that constitute publicly issued annual, quarterly, semi-annual, or other periodic reports, or Statements of Additional Information, for any of The Funds, including all supplements or amendments thereto, or that constitute computer databases serving as an underlying source of any financial information appearing in such reports or statements.

# **REQUEST FOR PRODUCTION NO. 123:**

All documents and tangible things in your possession, custody, or control that constitute internal financial reports that provide further detail or breakdowns for the line items contained in any publicly available financial report for any of The Funds.

## **REQUEST FOR PRODUCTION NO. 124:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to the benefits and advantages, or detriments and disadvantages, to any of The Funds of using PIM as their investment advisor as opposed to using some entity other than PIM.

### **REQUEST FOR PRODUCTION NO. 125:**

All documents and tangible things in your possession, custody, or control that constitute contracts or agreements as between any member of any Board of Trustees for any of The Funds on the one hand, and any Putnam entity on the other hand.

#### **REOUEST FOR PRODUCTION NO. 126:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to any arrangements for any member of any of the Boards of Trustees for any of The Funds to receive brokerage services at a discount.

### **REQUEST FOR PRODUCTION NO. 127:**

All documents and tangible things in your possession, custody, or control that constitute, contracts or agreements (other than Management Contracts) between or among PIM, PRM, and/or any of The Funds.

## **REQUEST FOR PRODUCTION NO. 128:**

All documents and tangible things in your possession, custody, or control that list, explain, characterize, or describe the nature and/or extent of any services provided by or on behalf of PIM and/or PRM to any of the Putnam Mutual Funds.

## **REQUEST FOR PRODUCTION NO. 129:**

All documents and tangible things in your possession, custody, or control that reflect, concern, refer, or relate to any securities clearing relationship between PIM, PRM, and any other person or entity.

# **REQUEST FOR PRODUCTION NO. 130:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate to any internal policies, practices, or procedures purportedly followed by PIM and/or PRM when providing services under any Management Contract or pursuant to any Distribution Plan for any of the Putnam Mutual Funds.

#### **REQUEST FOR PRODUCTION NO. 131:**

All documents and tangible things in your possession, custody, or control that constitute or summarize records of the daily purchases and sales of securities made on behalf of each of The Funds at any and all times during the Damages Period.

#### **REQUEST FOR PRODUCTION NO. 132:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate to any legal, accounting, financial, compliance, or other audits (whether internal or external) relating any of The Funds including, but not limited to, any opinion letters of professionals such as attorneys or accountants, and/or any information or materials provided to any auditor relating to Management Fees and/or 12b-1 Fees.

# **REQUEST FOR PRODUCTION NO. 133:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate to any contracts or agreements by which PIM and/or PRM subcontract with or for any other person or entity to perform any services pursuant to any Management Contract or Distribution Plan with any of The Funds.

## **REQUEST FOR PRODUCTION NO. 134:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to any of the Plaintiffs in the above-captioned action, including but not limited to account opening documents and account statements.

## **REQUEST FOR PRODUCTION NO. 135:**

All documents and tangible things in your possession, custody, or control that concern, refer, or relate to identifying all securities research or analysis used in connection with any of The Funds that was provided to PIM by any person or entity other than PIM employees, including the costs to PIM of acquiring such securities research or analysis.

## **REQUEST FOR PRODUCTION NO. 136:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate any practices, contracts, or agreements by which securities owned by or on behalf of any of The Funds are loaned to any other person or entity, including documents relevant to establishing the amount of profits realized as the result of such loans.

## **REQUEST FOR PRODUCTION NO. 137:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, refer, or relate to communications to or from shareholders of any of The Funds concerning Management Fees and/or 12b-1 Fees charged to The Funds.

### **REQUEST FOR PRODUCTION NO. 138:**

All documents and tangible things in your possession, custody, or control relevant to establishing on an annualized basis relative to each of The Funds for each of the years of their existence the profits that PIM and/or PRM have realized on the Management Fees and 12b-1 Fees that they have charged, and the per unit costs and expenses that they have incurred.

## **REQUEST FOR PRODUCTION NO. 139:**

All documents and tangible things in your possession, custody, or control that constitute, reflect, concern, or refer or relate to marketing and/or sales plans for any of The Funds.

#### **REQUEST FOR PRODUCTION NO. 140:**

All documents and tangible things in your possession, custody, or control constituting internal financial reports or analyses pertaining to PIM, PRM, or any of The Funds including, but not limited to, budgets, forecasts, and cost accounting reports.

## **REQUEST FOR PRODUCTION NO. 141:**

All documents and tangible things in your possession, custody, or control that reflect. concern, or relate to the issues of if, whether, how, or to what extent any of the portfolio holdings or investment strategies of any of PAC's Institutional Accounts are, or have been. modeled after any of the portfolio holdings or investment strategies of any of the Putnam Mutual Funds.

Dated: May 26, 2005 Respectfully served,

STEVEN G. WICKS; GERALD A. KALBFLEISCH; MICHAEL HATHAWAY; and MYRTLE HATHAWAY

By their attorneys,

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# CERTIFICATE OF SERVICE

I, Marc N. Henschke, hereby certify that on May 26, 2005, I caused the attached Plaintiffs' First Set Of Requests For The Production Of Documents And Tangible Things To Defendants Putnam Investment Management, LLC And Putnam Retail Management, LLP to be served by hand and/or first class mail upon Defendants' counsel of record at the following addresses:

#### BY FIRST CLASS MAIL

Seth M. Schwartz, Esq. Skadden, Arps, Slate, Meagher & Flom LLP Four Times Square New York, NY 10036

and

#### BY HAND DELIVERY

James R. Carroll, Esq. Skadden, Arps, Slate, Meagher & Flom LLP One Beacon Street Boston, Massachusetts 02108-3194

Dated: May 26, 2005